1	[Submitting Counsel on Signature Page]		
2			
3			
4			
5			
6			
7			
8			
9 10			
10	UNITED STATES	DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14			
15	In re LIDODERM ANTITRUST LITIGATION	Master File No. 14-md-02521-WHO	
16		MDL No. 2521	
17		STIPULATION AND ORDER MODIFYING	
18	THIS DOCUMENT RELATES TO:	DEADLINE FOR FILING OF PRELIMINARY APPROVAL MOTIONS	
19	ALL ACTIONS		
20			
21			
22			
23 24			
24 25			
26			
27			
28			

On February 23, 2018, the Court entered the parties' stipulation setting March 9, 2018, as the 1 2 deadline for Direct Purchaser Plaintiffs and End-Payor Plaintiffs to file their motions for preliminary 3 approval of their settlements with all Defendants. ECF 997. While the parties have worked diligently 4 to finalize the settlement agreements and related papers and have made substantial progress, the parties 5 respectfully request a modest extension of time to resolve remaining issues and obtain client approval. The parties therefore request that the deadline for the filing of motions for preliminary approval be 6 7 extended from March 9, 2018 to March 16, 2018. 8 Therefore, IT IS HEREBY STIPULATED AND AGREED by the parties, through their 9 respective counsel of record and subject to Court approval, that Direct Purchaser Plaintiffs and End-10 Payor Plaintiffs shall file motions for preliminary approval of their settlements with Teikoku, Watson, 11 and Endo by March 16, 2018. 12 13 DATED: March 8, 2018 Respectfully submitted, 14 For the Direct Purchaser Plaintiffs: For the End-Payor Plaintiffs: 15 /s/ Peter R. Kohn /s/ Dena C. Sharp Peter R. Kohn Daniel C. Girard (SBN 114826) 16 Joseph T. Lukens Dena C. Sharp (SBN 245869) GIRARD GIBBS LLP **FARUOI & FARUOI LLP** 17 101 Greenwood Avenue, Suite 600 601 California Street, 14th Floor 18 Jenkintown, PA 19046 San Francisco, CA 94108 Telephone: (215) 277-5770 Telephone: (415) 981-4800 19 Facsimile: (215) 277-5771 Facsimile: (415) 981-4846 Email: pkohn@faruqilaw.com Email: dcg@girardgibbs.com 20 Email: chc@girardgibbs.com 21 /s/ David S. Nalven Thomas M. Sobol /s/ Sharon K. Robertson 22 Sharon K. Robertson David S. Nalven Gregory T. Arnold Donna M. Evans 23 HAGENS BERMAN SOBOL SHAPIRO Robert A. Braun 24 LLP COHEN MILSTEIN SELLERS & TOLL 55 Cambridge Parkway, Suite 301 PLLC 25 Cambridge, MA 02142 88 Pine Street, 14th Floor 26 Telephone: (617) 482-3700 New York, New York 10005 Email: tom@hbsslaw.com Telephone: (212) 838-7797 27 Email: davidn@hbsslaw.com Facsimile: (212) 838-7745 28

1	Email: grega@hbsslaw.com	Email: srobertson@cohenmilstein.com Email: devans@cohenmilstein.com
2	/s/ Noah Silverman	Email: rbraun@cohenmilstein.com
	Bruce E. Gerstein	
3	Noah Silverman	/s/ Renae D. Steiner
4	Ephraim R. Gerstein	Renae D. Steiner
٠,	GARWIN GERSTEIN & FISHER LLP	HEINS MILLS & OLSON, P.L.C.
5	88 Pine Street, 10th Floor	310 Clifton Avenue
6	New York, NY 10005	Minneapolis, MN 55403
0	Telephone: (212) 398-0055	Telephone: (612) 338-4605
7	Facsimile: (212) 764-6620	Facsimile: (612) 338-4692 Email: rsteiner@heinsmills.com
8	Email: bgerstein@garwingerstein.com Email: nsilverman@garwingerstein.com	Email. Istemer@nemsimis.com
0	Email: egerstein@garwingerstein.com	Co-Lead Counsel for the End-Payor Class
9	Eman: egerstemægarwingerstem.com	Co-Lead Counsel for the Lita-1 dyor Class
10	Co-Lead Counsel for the	Joseph R. Saveri
10	Direct Purchaser Class	Joshua P. Davis
11		Ryan J. McEwan
12	For Defendants Teikoku Pharma	JOSEPH SAVERI LAW FIRM, INC.
12	USA, Inc. and Teikoku Seiyaku Co., Ltd.	601 California Street, Suite 1000
13	/s/ Joseph A. Meckes	San Francisco, California 94111
	Noriyuki Shimoda (State Bar No. 176973)	Telephone: (415) 500-6800
14	Joseph A. Meckes (State Bar No. 190279)	Facsimile: (415) 395-9940
15	Rafael Langer-Osuna (State Bar No. 300948)	Email: jsaveri@saverilawfirm.com
	SQUIRE PATTON BOGGS (US) LLP	Email: rmcewan@saverilawfirm.com
16	275 Battery Street, 26th Floor	Liaison Counsel for the End-Payor Class
17	San Francisco, California 94111	Littison Counsel for the Little I tryor Citass
	Telephone: (415) 954-0200	For Defendant Endo Pharmaceuticals, Inc.
18	Facsimile: (415) 393-9887	- 0.
19	Noriyuki.Shimoda@squiresanders.com	/s/ Heidi K. Hubbard
	Joseph.Meckes@squiresanders.com	Heidi K. Hubbard (admitted pro hac vice)
20	Rafael.Langerosuna@squirepb.com	Stanley E. Fisher (admitted pro hac vice)
21	/s/ David S. Elkins	Benjamin M. Greenblum (admitted pro hac vice)
-	David S. Elkins (State Bar No. 148077)	WILLIAMS & CONNOLLY LLP
22	SQUIRE PATTON BOGGS (US) LLP	725 Twelfth Street, N.W.
23	1801 Page Mill Road, Suite 110	Washington, D.C. 20005
23	Palo Alto, CA 94304	Telephone: (202) 434-5000 hhubbard@wc.com
24	Telephone: (650)-856-6500	sfisher@wc.com
25	Facsimile: (650) 843-8777	bgreenblum@wc.com
23	David.Elkins@squirepb.com	ogreenorama, we.com
26		
27	Attorneys for Defendants Teikoku Pharma	
27	USA, Inc. and Teikoku Seiyaku Co., Ltd.	
28		2
		2

1	Daniel Asimow (State Bar No. 165661) ARNOLD & PORTER KAYE SCHOLER
2	ARNOLD & PORTER RATE SCHOLER LLP
	Three Embarcadero Center, 10th Floor
3	San Francisco, California 94111-4024 Telephone: (415) 471-3100
4	Facsimile: (415) 471-3400
5	Daniel.Asimow@apks.com
6	Attorneys for Defendant Endo Pharmaceuticals
	Inc.
7	
8	For Defendants Actavis, Inc. (f/k/a Watson Pharmaceuticals, Inc.), Watson Laboratories,
9	Inc., Actavis plc., Anda Inc., Anda
10	Pharmaceuticals, Inc., and Valmed
11	Pharmaceuticals, Inc.
	/s/ Karen Hoffman Lent
12	Karen Hoffman Lent (admitted pro hac vice)
13	SKADDEN, ARPS, SLATE, MEAGHER & FLOM
14	Four Times Square
15	New York, New York 10036
	Telephone: (212) 735-3000 Facsimile: (917) 777-3000
16	Karen.Lent@skadden.com
17	
18	Steven C. Sunshine (admitted pro hac vice) Sean M. Tepe (admitted pro hac vice)
19	SKADDEN, ARPS, SLATE, MEAGHER
	& FLOM
20	1440 New York Ave. NW Washington DC, 20005
21	Telephone: (202) 371-7000
22	Facsimile: (202) 393-5760
23	Steve.Sunshine@skadden.com Sean.Tepe@skadden.com
	Scan. Tepe@skadden.com
24	Attorneys for Defendants Actavis, Inc. (f/k/a
25	Watson Pharmaceuticals, Inc.), Watson Laboratories, Inc., Actavis plc., Anda Inc., Anda
26	Pharmaceuticals, Inc., and Valmed
27	Pharmaceuticals, Inc.
28	
40	3
	1

ATTESTATION I, Dena C. Sharp, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Modifying Deadline For Filing Preliminary Approval Motions. I attest under penalty of perjury that concurrence in this filing has been obtained from all counsel. DATED: March 8, 2018 /s/ Dena C. Sharp Dena Sharp **ORDER** PURSUANT TO STIPULATION, IT IS SO ORDERED. DATED: March 9, 2018 liam H. Orrick United States District Judge